



**STATEMENT OF BASIS**  
**Page 1 of 3**  
BAQ Air Permitting Division

|                       |                                   |                       |                         |
|-----------------------|-----------------------------------|-----------------------|-------------------------|
| <b>Company Name</b>   | Augusta Fiberglass Coatings, Inc. | <b>Permit Writer:</b> | Kathleen T. Haddock, PE |
| <b>Permit Number:</b> | TV-0300-0023                      | <b>Date:</b>          | <b>DRAFT</b>            |

**DATE APPLICATION RECEIVED:** June 29, 2017

**DATE OF LAST INSPECTION:** September 16, 2016 – No violations

**FACILITY DESCRIPTION:** August Fiberglass Coatings, Inc. owns and operates a fiberglass products manufacturing facility. Major products are fiberglass tanks and fiberglass piping.

**PROJECT DESCRIPTION:** Title V Operating Permit Renewal

**COLLOCATION DETERMINATION:** On August 14, 2013, the facility submitted a letter requesting approval for the relocation and operation of some permitted fabrication equipment to another facility at 415 Walker Street, Blackville, approximately one mile from the primary facility 86 Lake Cynthia Road, Blackville (permit number 0300-0023). The equipment relocation was requested in order to more efficiently lay out and operate the fabrication process.

The Department approved the relocation of the equipment in a letter dated August 29, 2013. The facility is required to maintain an on-site implementation log (OSIL) and only existing permitted equipment was approved for the relocation. Other requirements are outlined in the response letter.

Both the facility request and Department response letter are included in the Title V application package.

**CHANGES SINCE LAST OP ISSUANCE:** SC Regulation 61-62.5, Standard No. 5.1 was repealed on June 26, 2015. Condition 5.D.1 of the current permit, issued November 27, 2012, limited VOC emissions from the facility as LAER. This limit was not also included for PSD avoidance and will be removed from the permit.

**Table 1: FACILITY WIDE POTENTIAL EMISSIONS**

| Pollutant                  | Uncontrolled Emissions | Controlled/Limited Emissions |
|----------------------------|------------------------|------------------------------|
|                            | TPY                    | TPY                          |
| Styrene                    | 107.9                  | NA                           |
| Methylene Chloride (MeCl)  | 16.2                   | NA                           |
| n, n-dimethylaniline (DMA) | 2.73                   | NA                           |
| Total HAP                  | 127                    | 127                          |
| VOC                        | 123                    | NA                           |

**OPERATING PERMIT STATUS**

This facility operates under Title V Operating Permit; issued on November 27, 2012 with an effective date of January 1, 2013 and an expiration date of December 31, 2017. The facility was modified on February 5, 2014 through the minor modification process for inclusion of the equipment relocation request described above.

In accordance with SC Regulation 61-62.70.5 (a)(1)(iii), the facility submitted a timely renewal application received on June 29, 2017.



**STATEMENT OF BASIS**  
**Page 2 of 3**  
 BAQ Air Permitting Division

|                       |                                   |                       |                         |
|-----------------------|-----------------------------------|-----------------------|-------------------------|
| <b>Company Name</b>   | Augusta Fiberglass Coatings, Inc. | <b>Permit Writer:</b> | Kathleen T. Haddock, PE |
| <b>Permit Number:</b> | TV-0300-0023                      | <b>Date:</b>          | <b>DRAFT</b>            |

**Table 2: REGULATORY APPLICABILITY REVIEW**

| Regulations                    | Comments/Periodic Monitoring Requirements   |
|--------------------------------|---|
| Section II.E – Synthetic Minor | Not Applicable: The facility does not have any federally enforceable emissions limits for PSD avoidance.  |
| Standard No. 1                 | Not Applicable: The facility does not operate any fuel burning equipment subject to the requirements of the standard.   |
| Standard No. 3 (state only)    | Not Applicable: The facility does not operate any waste combustion equipment.   |
| Standard No. 4                 | Applicable: The facility is subject to the visible emissions limit of the standard. For documentation, the facility has been subject to a visible emission limit of 20% opacity since the original construction permits were issued in 2000, even though most of the equipment allowed under these construction permits was installed in 1969. The facility-wide 20% opacity limit will remain in place.  |
| Standard No. 5                 | Not Applicable: The facility is located in Barnwell County. In accordance with Section I, Part B. 1, the standard does not apply to facilities in Barnwell County.  |
| Standard No. 5.2               | Not Applicable: The kerosene and propane-fired space heaters are exempt in accordance with Section I B (1), based on the exemption in SC Regulation 61-62.1, Section II, B.2(a).  |
| Standard No. 7                 | Not Applicable: The facility does not have the PTE 250 TPY of any regulated pollutant.  |
| 61-62.6                        | Applicable: The facility is subject to the state-wide fugitive emissions requirements of Section III of the regulation, as stated in condition M.4 of the Title V permit.   |
| 40 CFR 60 and 61-62.60         | Not Applicable: Subpart Kb – Volatile Organic Liquid Storage Vessels does not apply to the acetone (AST1), styrene (SST1), propane (PST1 – PST4), kerosene (KST1), diesel (DST), or resin (RST1 – RST3) storage tanks as all tanks are below the size applicability threshold of 19,815 gallons, in accordance with §60.110b (a).   |
| 40 CFR 61 and 61-62.61         | Not Applicable: None of the subparts are applicable.  |
| 40 CFR 63 and 61-62.63         | Applicable: The facility is a major source of HAP and is subject to subpart WWWW – Reinforced Plastic Composites Production. The facility uses the weighted average emission limit option (§63.5810(d)(2)) and work practice standards, as applicable, to demonstrate compliance with the subpart.<br><br>The facility does not operate any equipment subject to Subpart ZZZZ – RICE. The 180 kw (241 bhp) gasoline generator has been removed from the facility. |
| 61-62.68                       | Not Applicable: The facility does not store any chemicals regulated under §112(r).  |
| 40 CFR 64 (CAM)                | Not Applicable: The facility does not operate any control devices.  |

**Table 3: AMBIENT AIR STANDARDS REVIEW**

| Regulations                 | Comments/Periodic Monitoring Requirements   |
|-----------------------------|---|
| Standard No. 2              | Referencing the modeling summary dated December 16, 2009, the facility is exempt from Standard Nos. 2 and 7 modeling as there are no significant emissions of PM and no emissions of other criteria pollutants. Standard No. 8 is |
| Standard No. 7.c            |   |
| Standard No. 8 (state only) |   |



**STATEMENT OF BASIS**  
**Page 3 of 3**  
BAQ Air Permitting Division

|                       |                                   |                       |                         |
|-----------------------|-----------------------------------|-----------------------|-------------------------|
| <b>Company Name</b>   | Augusta Fiberglass Coatings, Inc. | <b>Permit Writer:</b> | Kathleen T. Haddock, PE |
| <b>Permit Number:</b> | TV-0300-0023                      | <b>Date:</b>          | <b>DRAFT</b>            |

**Table 3: AMBIENT AIR STANDARDS REVIEW**

| <b>Regulations</b> | <b>Comments/Periodic Monitoring Requirements</b>   |
|--------------------|--|
|                    | not applicable as HAP emissions are subject to and in compliance with a MACT (Subpart WWWW) and therefore are exempt from modeling in accordance with Section I.D(1) of the standard. Remaining Standard No. 8 pollutants were not modeled as they are exempt. |

**PUBLIC NOTICE**

This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II.N and SC Regulation 61-62.70.7(h). The comment period was open from June 22, 2018 to July 21, 2018 and was placed on the BAQ website during that time period.

**SUMMARY AND CONCLUSIONS**

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.